

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DAVID M. POARCH; R BRETT KRAMER,)
individually and as trustee of the R. Brett)
Kramer Trust B; and PJ Oil LLC, On Behalf of)
Themselves and all Others Similarly Situated,)

Plaintiffs,

v.

UNIT CORPORATION,

Defendant.

Case No. CIV-23-798-PRW

**UNIT CORPORATION’S UNOPPOSED MOTION FOR EXTENSION
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS’
FIRST AMENDED CLASS ACTION COMPLAINT**

COMES NOW Defendant, Unit Corporation, and respectfully requests the Court to enter an order extending, by two weeks, Defendant’s deadline to answer or otherwise respond to Plaintiffs’ First Amended Class Action Complaint. In support of this motion, Defendant shows the Court as follows:

1. Plaintiffs filed their Class Action Complaint on September 11, 2023. (Dkt. 1)
2. Defendant timely filed its Motion to Dismiss on October 10, 2023. (Dkt. 8)
3. Defendant’s lead counsel, Craig Regens, subsequently withdrew from this case on October 19, 2023. (Dkt. 12)
4. On October 23, 2023, Plaintiffs filed their First Amended Class Action Complaint. (Dkt. 13)

5. Because an Amended Complaint was filed, the Court found that Defendant's Motion to Dismiss (Dkt. 8) is moot. (Dkt. 14)

6. In light of the foregoing, under Fed. R. Civ. P. 15(a)(3), Defendant's current deadline to answer or otherwise respond to Plaintiffs' First Amended Class Action Complaint is November 6, 2023.

7. Because (i) Defendant has new lead counsel and (ii) Plaintiffs' amended Complaint has made substantive revisions to the relief sought in this case, Defendant requests a two-week extension, to and including November 20, 2023, of its current deadline to answer or otherwise respond to Plaintiffs' First Amended Class Action Complaint (Dkt. 13).

8. This is Defendant's first request for an extension of time.

9. This request is not made for purposes of delay, but so that justice may be done. This extension will not affect the timeline of this case because the extension is short, the case is still in the early stages, and a scheduling order has not been entered.

10. Counsel for Defendant conferred with Plaintiffs' counsel by telephone on November 2, 2023, concerning the requested extension. The Plaintiff does not oppose the relief requested in this Motion.

WHEREFORE, Defendant, Unit Corporation, respectfully requests that the Court enter an order extending Defendant's deadline to answer or otherwise respond to Plaintiffs' First Amended Class Action Complaint by two weeks, to and including November 20, 2023.

Respectfully submitted,

/s/ Ashlyn M. Smith

Scott Kiplinger, OBA No. 33938
Ashlyn M. Smith, OBA No. 34025
GABLEGOTWALS
499 West Sheridan Avenue
BOK Park Plaza, Suite 2200
Oklahoma City, OK 73102
Telephone: (405) 235-5500
Facsimile: (405) 235-2875
Email: skiplinger@gablelaw.com
asmith@gablelaw.com

-and-

Mia Vahlberg, OBA No. 20357
Mark D.G. Sanders OBA No. 22922
GABLEGOTWALS
110 N. Elgin Avenue, Suite 200
Tulsa, OK 74120-1490
(918) 595-4800
(918) 595-4990 (fax)
Email: mvahlberg@gablelaw.com
msanders@gablelaw.com

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Robert J. Bartz
Douglas J. McGill

/s/ Ashlyn M. Smith

Ashlyn M. Smith